



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Kim -
let's discuss
set up meeting
1/10/98
JWS

Ms. Carole Petersen, Chief
New Jersey Remediation Branch
U.S. EPA Region 2
290 Broadway
New York, NY 10007-1866

Dear Ms. *Carole* Petersen:

NOV 12 1997

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) is in receipt of your letter dated October 24, 1997 regarding the possible revision to the soils remedy outlined in the April 18, 1994 Record of Decision (ROD) for the above referenced site. The Department agrees that some background samples should be taken off-site to determine if the lead levels found on-site are at background levels. However, requiring twenty to thirty samples is excessive, and using guidance for data usability in risk assessments is inappropriate since this data is not being collected for risk assessment purposes.

The Department would like to suggest a compromise between the Department's original recommendation of two to three samples and EPA's recommendation of twenty to thirty samples. The Technical Requirements for Site Remediation (N.J.A.C. 7:26E) Subchapter 3.10 states that the collection of ten samples is adequate for a background soil investigation. Therefore, it is the Department's recommendation that ten soil samples be collected off-site for the purposes of determining background lead concentrations. In addition, the PRP will be requested to submit any information regarding mapped locations, historical lot, block, or other tax data, etc., regarding the historical mining that occurred in the area, as your letter suggests.

Finally, the Department agrees that a focused feasibility study is required since the on-site capping remedy was not evaluated in the ROD which will evaluate various types of caps to determine the one most suitable for the site.

Should you have any questions or wish to discuss this further, please contact me at (609) 633-1455 or have your staff call Gwen Barunas at (609) 633-7261.

Sincerely,

Bruce Venner, Chief
Bureau of Federal Case Management

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